

# memorandum

Rocky Flats Office



000020085

DATE: JUN 18 1992

REPLY TO:  
ATTN OF: ERD:SG:6810

SUBJECT: OU1 IM/IRA Effluent Capacity, Changes to Design, and "Real Time" Analysis

TO: J. M. Kersh, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.

There are three issues that have arisen with the Operable Unit 1 (881 Hillside) Interim Measure/Interim Remedial Action (IM/IRA). The first issue concerns the lack of reserve capacity and the water quality in the treatment effluent tanks. The second issue concerns why the "as built" IM/IRA collection system and treatment plant were not apparently constructed according to the IM/IRA Decision Document, dated January 1990. The third issue concerns "real time" analysis and/or field screening capability for IM/IRAs.

There are several constituents of concern in the treated water being held in the IM/IRA effluent tanks. Based on the June 12, 1992 meeting with EPA and CDH, they are most concerned with the organics that leached from the vinyl paint from the interior of the effluent tanks. Options were discussed, including (1) retreating the effluent, (2) adding Granular Activated Carbon (GAC) units after the effluent tanks, and (3) discharging without treatment because the organics were below Maximum Concentrations Limits. We are asking for EG&G's recommendation so that we can consult with EPA/CDH prior to release.

Concerning the second issue, you are requested to determine why and when any changes to the IM/IRA collection point and treatment plant system were made. As shown in Figure 6-1 of the January 1990 IM/IRA, the 881 Footing Drain and Well 9-74 were not originally designed to be plumbed into the French Drain. Additionally, the treatment plant was to have had an activated alumina unit. These apparent changes have not only potentially put us in violation of the IM/IRA Decision Document but have also affected our flexibility and options in dealing with and correcting the problems associated with pH. You are requested to respond to this issue within three weeks after the date of this memorandum.

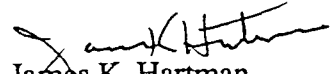
The ability to make decisions concerning the IM/IRA treatment and release options is adversely affected by our inability to perform "real time" analysis by mobile laboratories and/or dedicated instrumentation. We remind you of the current CPAF Performance Objective of:

Implementation of Mobile/Field instrumentation to support ER activities where "real time" analysis is needed.

JUN 18 1992

It is imperative that we gain the capability of conducting "real time" analysis for IM/IRAs and other ER activities. Please be advised that this memorandum serves as amplification that this CPAF Performance Objecting continues through the end of 1992.

These issues have already been discussed with your staff. If you have any questions, please contact Scott Grace at extension 7199.

  
James K. Hartman  
Assistant Manager  
for Environmental Management

cc:

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